

STATE OF SOUTH CAROLINA	)	IN THE COMMON PLEAS COURT
	)	
COUNTY OF AIKEN	)	FOR THE SECOND JUDICIAL CIRCUIT
	)	
EVELYN GREEN,	)	Civil Action No.: 2020CP02_____
	)	
Plaintiff,	)	
	)	
vs.	)	<b><u>SUMMONS</u></b>
	)	(JURY TRIAL DEMANDED)
	)	
WINN DIXIE STORES, INC.,	)	
	)	
Defendant.	)	
_____	)	

**TO: THE DEFENDANT ABOVE-NAMED:**

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to said Complaint on the subscriber at P.O. Box 646, Orangeburg, South Carolina, 29116 within thirty (30) days from the service hereof, exclusive of the date of such service; and if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

*s/ Lakesha Jeffries, Esquire*  
 Lakesha Jeffries, Esquire  
 SC Bar No: 71736  
 Bryan S. Jeffries, Esquire  
 SC Bar No: 70558  
 JEFFRIES LAW FIRM, LLC  
 Post Office Box 646  
 Orangeburg, SC 29116  
 Telephone: (803) 531-6300  
 Facsimile: (803) 536-6001  
 Email: ljeffries@jeffrieslawsc.com  
 ATTORNEYS FOR THE PLAINTIFF

November 5, 2020  
 Orangeburg, South Carolina

STATE OF SOUTH CAROLINA	)	IN THE COMMON PLEAS COURT
	)	
COUNTY OF AIKEN	)	FOR THE SECOND JUDICIAL CIRCUIT
	)	
EVELYN GREEN,	)	Civil Action No.: 2020CP02_____
	)	
Plaintiff,	)	
	)	
vs.	)	<b><u>COMPLAINT</u></b>
	)	(JURY TRIAL DEMANDED)
	)	
WINN DIXIE STORES, INC.,	)	
	)	
Defendant.	)	
_____	)	

NOW COMES the Plaintiff, above-named, complaining of the Defendant, above-named, and does allege and show unto this Honorable Court as follows:

1. The Plaintiff is a citizen and resident of the County of Aiken, State of South Carolina.
2. The Plaintiff is informed and believes the Defendant is a foreign corporation which at all material times conducted business in the State of South Carolina, County of Aiken and is subject to jurisdiction in South Carolina.
3. That the most substantial act giving rise to the cause of action in this case occurred in Aiken County, and therefore, venue is proper.
4. That this Court has jurisdiction over the Parties and subject matter herein.
5. That on or about May 24, 2019, the Defendant, Winn Dixie Stores, Inc., was the owner and operator of a Bi-Lo, Store #5802, in New Ellenton, SC.
6. That the Plaintiff was a permitted user in the Defendant's premises to shop when she was caused to slip and fall as a result of sugar or some other transitory substance on the floor.
7. That the Defendant owed the Plaintiff a duty to maintain the aisle from any dangers or hazards that would cause the Defendant to slip and fall.

8. That the Defendant knew, or, in the exercise of reasonable care should have known, of the condition, or the Defendant created the condition either through the acts and/or omissions of its employees, in its negligent maintenance of the restroom area and allowing hazardous and dangerous conditions to exist and occur, and Defendant should have corrected the condition or warned the Plaintiff of its existence.
9. As a result of the negligence of the Defendant, Plaintiff suffered permanent bodily injury, and resulting pain and suffering, disability, disfigurement, mental anguish, loss of capacity for the enjoyment of life, expense of hospitalization, medical and nursing care, treatment, and loss of earnings of loss of ability to earn money. As the injuries are permanent, Plaintiff will continue to suffer losses in the future.
10. That the Plaintiff is informed and believes that she is entitled to an award of actual and punitive damages in an amount to be determined by a jury.

WHEREFORE, having fully set forth this Complaint herein, the Plaintiff prays that judgment be granted against the Defendant for actual damages, plus an appropriate sum for punitive damages for the injuries, losses and harm sustained herein, for the costs of this action, and, for such other relief as the Court may deem just and proper.

Respectfully submitted,

s/ Lakesha Jeffries, Esquire

Lakesha Jeffries, Esquire

SC Bar No: 71736

Bryan S. Jeffries, Esquire

SC Bar No: 70558

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